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10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;  
16 OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF LINDSAY COOPER  
IN SUPPORT OF PLAINTIFF WAYMO  
LLC'S ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL PORTIONS OF ITS  
REPLY IN SUPPORT OF ITS MOTION  
FOR A PRELIMINARY INJUNCTION,  
SUPPORTING DECLARATIONS, AND  
SUPPORTING EXHIBITS THERETO**

I, Lindsay Cooper, declare as follows:

1. I am an attorney licensed to practice in the State of California and am admitted to practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan, LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set forth in this Declaration, and if called as a witness I would testify competently to those matters.

2. I make this declaration in support of Waymo’s Administrative Motion to File Under Seal Portions of Its Reply in Support of Its Motion for a Preliminary Injunction, Supporting Declarations, and Supporting Exhibits Thereto (the “Administrative Motion”). The Administrative Motion seeks an order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo’s Reply in Support of Motion for a Preliminary Injunction	Highlighted Portions	Waymo (green highlighting); Uber <sup>1</sup> (blue highlighting)
Exhibits 64-66, 82-84, and 90 to the Declaration of Jordan Jaffe (“Jaffe Decl.”)	Green Highlighted Portions	Waymo
Exhibits 65-67, 84, and 91 to the Jaffe Decl.	Blue Highlighted Portions	Uber
Exhibits 61-64, 68-78, 80-83, 85-88, 92-101, 104-107, 109-110 to the Jaffe Decl.	Entire Documents	Uber
Declaration of Gregory Kintz (“Kintz Decl.”)	Highlighted Portions	Waymo (green highlighting); Uber (blue highlighting)

3. Waymo’s Reply in Support of Motion for Preliminary Injunction, declarations in support thereof, and exhibits thereto (collectively “PI Reply”) contain or refer to trade secret and confidential business information, which Waymo seeks to seal.

4. Waymo’s PI Reply (portions highlighted in green), Exhibits 64-66, 82-84, & 90, and the Kintz Decl. (portions highlighted in green) each contain, reference, and/or describe Waymo’s asserted trade secrets. The information Waymo seeks to seal includes the confidential design and

<sup>1</sup> “Uber” means Uber Technologies, Inc., Ottomotto LLC, and Otto Trucking LLC, collectively.

9           6.       Waymo only seeks to seal the portions of the PI Reply (highlighted blue), Exhibits 65-  
10 67, 84, & 91 (at portions highlighted in blue), and Exhibits 61-64, 68-78, 80-83, 85-88, 92-101, 104-  
11 107 & 109-110 as identified in the table above, because Waymo believes such information is  
12 considered confidential or non-public by Uber.

16 By /s/ Lindsay Cooper  
17 Lindsay Cooper  
Attorneys for WAYMO LLC

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Lindsay Cooper.

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-3- CASE NO. 3:17-cv-00939-WHA  
COOPER DECLARATION ISO WAYMO'S ADMINISTRATIVE MOTION TO SEAL